

REMARKS

Applicants thank Examiner Huffman for having allowed sixteen claims and for having indicated that eleven others would be allowable if suitably amended. The latter group has been amended, largely as specified by the Examiner, and it is believed that those claims are now in condition for allowance.

In addition, Applicants have canceled several claims that were in dispute. Please note that these claims have all been canceled without prejudice to their future reintroduction by continuation application or otherwise.

As to claims 8 and 14, it is suggested in the Official Action that Applicants recite specific numerical ranges for the recited "low velocity" and "low positioning accuracy". Although such ranges do appear in dependent claims, the Applicants respectfully submit that it would be improper to recite such ranges in these two broader claims.

The proper criterion for both velocity and positioning accuracy is not any absolute number but rather, as already recited in the claim, motion "at only low velocity and only low positioning accuracy needed for roughly centering the second sensor over successive colorimetric test-pattern patches in turn". In other words, the correct criterion is established not by absolute numbers but by the stated functionality, "needed for roughly centering . . . over successive . . . patches in turn".

This constraint in turn depends upon the system designer's choices of patch size, sensor size, and time to complete the measurements — but a key point of this aspect of the invention is simply that accuracy and velocity are much less de-

manding for the second sensor than for the first. Note that the Applicant's specification declares:

"First the printer must be used to print the test pattern onto the desired medium. Modernly this process is controlled by an application program in a host computer or in an onboard microprocessor that is part of the printer itself. The pattern usually includes many color patches, typically between fifty and several hundred."

With this degree of variation even in the number of patches in a test pattern — not to mention the size of the sheet used — the specific numerical-range recitations in certain claims may be helpful for orienting some readers, but it becomes clear that it would be inappropriate, even pointless, to couch the velocity and accuracy in terms of such absolute size numbers only.

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#### Section 103 rejections

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In the current Official Action the rejection of certain claims over combinations including Beauchamp, in view of Vincent '059 and Hirano, is maintained. In particular it is said in the response to Applicants' earlier papers that the Applicants' two sensor/carriage "subsystems" do not interact, i. e. are independent.

It was argued in earlier Actions that Hirano is squarely analogous ("inkjet") art, and cannot be distinguished merely on the basis that Hirano deals with pens rather than sensors. The two sensor/carriage units, however, do interact — and their operation is readily distinguished from Hirano's.

Applicants have amended claims 1 and 13 to highlight the interaction between the two groups of components, and in particular to recite a function that is not found in Hirano — namely, use of the carriage intercoupling to move the auxiliary carriage into position for essentially stationary opera-

tion of a component carried on the auxiliary carriage. Hirano's pens have no analogous mode of operating stationarily; it is believed that all "inkjet" marking systems rely on relative motion between the pen and the printing medium.

As to claim 26, Applicants have now amended that claim to more clearly emphasize the type and particularly the high quality of measurements made with the claimed system. Applicants believe that the cited references do not teach comparable colorimetric measurements.

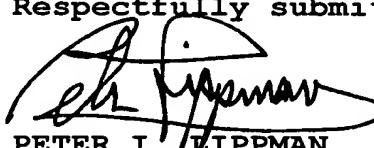
Other claim amendments of a routine and self explanatory sort have also been made to advance this case toward issue.

#### Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's favorable reconsideration and allowance of all the claims now standing in this case.

It is respectfully requested that, should there appear any further obstacle to allowance of the claims herein, the Examiner telephone the undersigned attorney to try to resolve the obstacle.

Respectfully submitted,

  
PETER I. LIPPMAN  
Registration No. 22,835  
Attorney for the Applicants

Ashen & Lippman  
4385 Ocean View Boulevard  
Montrose, California 91020

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TELEPHONE:  
818/249-5961